

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)
v.)
Plaintiff,) No. 3:23-cv-00243
SOUTHERN BAPTIST CONVENTION;) JUDGE RICHARDSON
GUIDEPOST SOLUTIONS LLC; and) MAGISTRATE JUDGE FRENSELY
EXECUTIVE COMMITTEE OF THE) JURY DEMAND
SOUTHERN BAPTIST CONVENTION,)
Defendants.)

EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST CONVENTION'S
RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), the Executive Committee of the Southern Baptist Convention (“Executive Committee”), provides the following Initial Disclosures:

- A. **The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**
1. Johnny Hunt. Johnny Hunt (“Hunt”) is the plaintiff in this action and has knowledge of relevant facts with respect to his claims against the Defendants.
 2. Janet Hunt. Janet Hunt is Hunt’s spouse and has knowledge of relevant facts with respect to Hunt’s claims against the Defendants.
 3. Southern Baptist Convention. The Southern Baptist Convention (the “SBC”) is a defendant in this action and may have knowledge of relevant facts with respect to the claims alleged against it and the defenses it intends to offer in this matter.
 4. Bart Barber. Barber is the President of the SBC and has knowledge of relevant facts regarding the Tweet he sent that is made the subject to Hunt’s claims against the Defendants.
 5. The SBC’s Credentials Committee. The SBC’s Credentials Committee has knowledge of relevant facts regarding the letter sent by the SBC’s Credentials

Committee to the Hiland Park Baptist Church dated February 1, 2023, which is made the subject of Hunt's claims against the Defendants.

6. Dr. Bruce Frank. Dr. Frank was the Task Force Chair of the SBC who executed the engagement letter dated October 5, 2021, by and between Guidepost Solutions LLC and SBC.
7. Guidepost Solutions LLC. Guidepost Solutions LLC ("Guidepost") is a defendant in this action and has knowledge of relevant facts with respect to the claims alleged against it, the defenses it intends to offer in this matter, and The Southern Baptist Convention Executive Committee's Response to Sexual Abuse Allegations and an Audit of the Procedures and Actions of the Credentials Committee (the "Report") authored by Guidepost.
8. Julie Myers Wood. Ms. Wood is the Chief Executive Officer of Guidepost. Ms. Wood executed the engagement letter dated October 5, 2021, by and between Guidepost and SBC.
9. The Executive Committee of the Southern Baptist Convention. The Executive Committee of the Southern Baptist Convention (the "Executive Committee") is a defendant in this action and has knowledge of relevant facts with respect to the claims alleged against it and the defenses it intends to offer in this matter.
10. Pastor Rolland Slade. Pastor Slade executed the engagement letter dated October 5, 2021, by and between Guidepost and SBC.
11. Hunt's accuser. Hunt's accuser has knowledge of relevant facts regarding the incident referenced in the Report which is at issue in this lawsuit.
12. Hunt's accuser's husband. Hunt's accuser's husband has knowledge of relevant facts regarding the incident referenced in the Report which is at issue in this lawsuit.
13. Witnesses 1, 2, and 3. These witnesses are referenced in the Report and have knowledge of relevant facts regarding their statements to Guidepost.
14. Roy Blankenship. Blankenship is referenced in the Report and has knowledge of relevant facts regarding his statement to Guidepost.
15. Any person identified by Hunt, SBC, or Guidepost.

- B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

Based on the information presently available, subject to further investigation, and pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), the Executive Committee hereby identifies the following categories of documents, electronically stored information, and tangible things (hereafter, "Documents") that are in its possession, custody, or control, and that it may use to support their claims or defenses, unless solely for impeachment:

- Executive Committee governing Documents;
- Certain Executive Committee policy and procedure Documents; and
- All Documents necessary for rebuttal or impeachment.

In addition, the Executive Committee includes and reserves the right to use any and all exhibits that may be used in depositions taken in this action, all documents produced in discovery by the Executive Committee, all documents identified in Plaintiff's and Co-Defendants' initial disclosures, and all documents produced by Plaintiff, Co-Defendants, or third parties in discovery. The descriptions above refer to non-privileged Documents and are not intended to waive the attorney-client privilege, work product doctrine, or any other applicable privilege or protection. The Executive Committee also reserves the right to amend and supplement the information provided herein based on discovery or the Court's rulings in this action.

C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable.

D. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Defendant will make available for inspection and copying any insurance agreement that may be applicable to satisfy all or part of a possible judgment in this action.

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Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, the EC will supplement its disclosures and responses as information becomes known through discovery.

Respectfully submitted,

s/R. Brandon Bundren

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*Attorneys for the Executive Committee of the Southern
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CERTIFICATE OF SERVICE

I certify that on June 15, 2023, I electronically served a true and correct copy of the Executive Committee of the Southern Baptist Convention's Rule 26(a)(1) Initial Disclosures on all counsel of record listed below:

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s/ R. Brandon Bundren

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